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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREAT NORTHERN INSURANCE CO.

Plaintiff,

-against-

BLUE ANCHOR LINE; BLUE ANCHOR
LINE A DIVISION OF TRANSPAC
CONTAINER SYSTEM LTD.;
KUEHNE & NAGEL, INC.,
KUEHNE & NAGAL S.A.;
HANJIN SHIPPING CO. LTD.,
CONTAINERPORT GROUP, INC.;

Defendants.

08 CV 3308 (SHS)(GWG)

ECF Case

Electronically filed

**DEFENDANT HANJIN
SHIPPING CO. LTD.'S
ANSWER TO THE
CROSS-CLAIM OF
CO-DEFENDANTS
BLUE ANCHOR LINE,
KUEHNE & NAGEL, INC.
and KUEHNE & NAGEL S.A.**

Defendant Hanjin Shipping Co. Ltd., by its attorneys Burke & Parsons, as and for its Answer to the Cross-claim of co-defendants Blue Anchor Line, Kuehne & Nagel, Inc. and Kuehne & Nagel S.A. (hereinafter "the BAL / Kuehne & Nagel co-defendants") herein, alleges upon information and belief as follows:

1. It admits the allegations set forth in paragraph 22 of the BAL / Kuehne & Nagel co-defendants' Answer and Cross-claim in this action.

2. It denies the allegations set forth in paragraph 23 of the BAL / Kuehne & Nagel co-defendants' Answer and Cross-claim insofar as they relate to defendant Hanjin and it denies knowledge or information sufficient to form a belief insofar as said allegations relate to co-defendant Containerport Group, Inc..

3. It admits that Hanjin had certain duties and responsibilities of carriage with respect to the cargo at issue but, except as so specifically admitted, it denies the remainder of the allegations set forth in paragraph 24 of the BAL / Kuehne & Nagel co-defendants' Answer and Cross-claim.

4. It denies the allegations set forth in paragraph 25 of the BAL / Kuehne & Nagel co-defendants' Answer and Cross-claim insofar as they relate to defendant Hanjin and it denies knowledge or information sufficient to form a belief insofar as said allegations relate to co-defendant Containerport Group, Inc.

5. It denies the allegations set forth in paragraph 26 of the BAL / Kuehne & Nagel co-defendants' Answer and Cross-claim insofar as they relate to defendant Hanjin and it denies knowledge or information sufficient to form a belief insofar as said allegations relate to co-defendant Containerport Group, Inc.

FIRST AFFIRMATIVE DEFENSE

6. It incorporates by reference all of the defenses and limitations of liability pleaded in paragraphs 20 through 30 inclusive of defendant Hanjin's Answer to the Complaint with the same force and effect as if herein repeated and set forth at length.

SECOND AFFIRMATIVE DEFENSE

7. With respect to the cargo at issue, the BAL / Kuehne & Nagel co-defendants were guilty of conduct sufficient to preclude any right or entitlement to indemnity in connection with this matter.

Dated: New York, NY
September 2, 2008

BURKE & PARSONS
Attorneys for Defendant
Hanjin Shipping Co. Ltd.

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